

Appin No. 09/575,120
Amtd. Dated September 25, 2003
Reply to Office action of July 1, 2003

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REMARKS/ARGUMENTS

1. The Applicant notes that the Examiner has accepted claims 9 and 10 and has indicated that claims 4 and 6-8 would be acceptable if written in independent form.

2. In paragraph 2 of the Office Action the Examiner has rejected claims 1-3 and 5 as lacking novelty in light of Housel (5,633,990). In reply, the Applicant notes that Housel is concerned with color mapping, that is, getting the best color on a given dot position by using the colors red, green, and blue to print an image that is input in Cyan, Magenta, Yellow and Black. The primary focus of Housel, best illustrated in Figure 6, is determining, for each input pixel, which output colour to print. The way Housel works is that they trade spatial resolution for color depth. That is, they use multiple dot positions (referred to as an n-tuple e.g. two dot positions) to produce an averaging effect for an overall color.

In contrast, the claimed invention is concerned with actually changing the dither cell itself, and is independent of what colors are being referenced. The dither cell is modified to achieve an improvement in that the decoding circuitry required for certain types of printers can be reduced.

In this way, Housel describes a technology that is fundamentally different from the claimed invention.

The Examiner relies on col. 4, line 19 to col. 6, line 23 to support her argument that Housel anticipates claim 1. However, that section contains no disclosure of the step of *"mapping said dither cell to a staggered dither cell"* as claimed. The Applicant submits for this reason that Housel does not anticipate claim 1. Furthermore, since claims 2 and 3 depend from unanticipated claim 1, the Applicant submits that claims 2 and 3 are also novel.

The Applicant also submits that col. 4, line 19 to col. 6, line 23 contains no disclosure of a dither cell in which *"lines of said values corresponding to odd pixels of said image in said cell [are] staggered relative to lines of said values corresponding to even pixels of said image"* as claimed in claim 5.

In anticipation of the Examiner suggesting that Figure 4 discloses this feature, the Applicant notes that the odd and even squares pictured in Figure 4 correspond to the odd and even pixels of the input image. Column 4, lines 22 to 24 state *"... consider the whole page 36 as being divided up into 2-tuples having Even pixels 38 and Odd pixels 40, as illustrated in FIG. 4."* It is clear from this disclosure that Figure 4 of Housel is not an illustration of staggered lines in a dither cell but merely the arrangement of odd and even pixels in an input image to be printed. The Applicant submits for this reason that Housel does not anticipate claim 5.

3. The Applicant submits that claims 1 to 3 and 5 are not anticipated by Housel and the Examiner is requested to reconsider and withdraw this novelty objection.

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It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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